

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

CHASE WILLIAMS and WILLIAM ZHANG,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

BLOCK.ONE, BRENDAN BLUMER, and
DAN LARIMER,

Defendants.

Case No. 1:20-cv-02809-LAK

Honorable Lewis A. Kaplan

DECLARATION OF JORDAN A. GOLDSTEIN

I, Jordan A. Goldstein, declare as follows:

1. I am a partner at Selendy & Gay PLLC, counsel for Plaintiffs. I am admitted to the bar of the State of New York and admitted to practice before this Court and am in good standing.


2. I make this declaration in support of Plaintiffs' Motion for Leave to Substitute Parties, Change the Caption, and Amend the Complaint.

3. Attached hereto as Exhibit 1 is a true and correct copy of Plaintiffs' Proposed Amended Complaint.

4. Attached hereto as Exhibit 2 is a true and correct copy of a redline comparison between Plaintiffs' Proposed Amended Complaint (attached hereto as Exhibit 1) and the current operative Complaint (ECF No. 1).

5. I declare under the penalty of perjury of the laws of the United States of America that the foregoing is true.

Dated: June 21, 2020
New York, New York



Jordan A. Goldstein
SELENDY & GAY PLLC
1290 Sixth Avenue, 17th Floor
New York, NY 10104
jgoldstein@selendygay.com